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9 **UNITED STATES DISTRICT COURT**
10 **EASTERN DISTRICT OF CALIFORNIA**

11 CHEYENNE LOLA JULIAN, } Case No.: 2:22-CV-01775-AC
12 Plaintiff, } STIPULATION AND [PROPOSED] ORDER
13 } FOR AN EXTENSION OF TIME
14 vs. }
15 KILOLO KIJAKAZI, }
Acting Commissioner of Social Security, }
16 Defendant. }
17

18
19 Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the
20 parties, through their respective counsel of record, that the time for Defendant to respond to
21 Plaintiff's Motion for Summary Judgment be extended thirty (30) days from April 17, 2023, up
22 to and including May 17, 2023. This is the Defendant's first request for an extension.

23 Defendant requests this extension in order to further consider the 1,420 page
24 administrative record in light of the three issues raised in Plaintiff's motion. Counsel for
25 Defendant has not been dilatory. Since March 3, 2023, when Plaintiff filed her Motion for
26 Summary Judgment, counsel for Defendant has filed seven briefs and completed one negotiated
27 settlement. Counsel for Defendant has another seven outstanding briefs to be filed in the next
28 thirty days.

The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.

Respectfully submitted,

Dated: April 12, 2023

/s/ *Francesco Benavides**
(*as authorized via e-mail on Apr. 12, 2023)
FRANCESCO P. BENAVIDES
Attorney for Plaintiff

Dated: April 12, 2023

PHILLIP A. TALBERT
United States Attorney
MATHEW W. PILE
Associate General Counsel
Social Security Administration

By: /s/ Zachary Berkoff-Cane
ZACHARY BERKOFF-CANE
Special Assistant U.S. Attorney

Attorneys for Defendant

ORDER

Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an extension, up to and including May 17, 2023, to respond to Plaintiff's Motion for Summary Judgment.

DATED: April 12, 2023

Allison Claire
ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE